



09-CV-05119-STIP

HONORABLE ROBERT J. BRYAN

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

PHILIP CHINN,

Plaintiff,

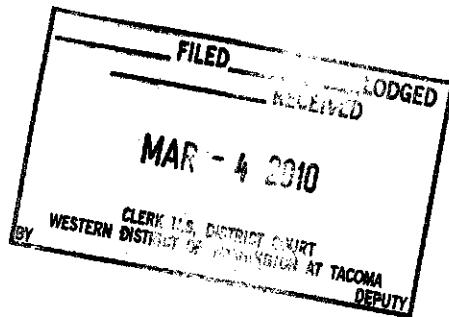
v.

BENJAMIN BLANKENSHIP, individually and in his capacity as a TROOPER of the WASHINGTON STATE PATROL and JANE DOE BLANKENSHIP, and the marital community thereof, RICHARD C. PIGMON, individually and in his Official capacity as a TROOPER of the WASHINGTON STATE PATROL and JANE DOE PIGMON, and the Marital community thereof; MARK. S. SVINTH individually and in his Official Capacity as a TROOPER of the WASHINGTON STATE PATROL and JANE DOE SVINTH and the Marital community thereof; JONATHAN P. PITTS, individually and in his Official capacity as a TROOPER of the WASHINGTON STATE PATROL, and JANE DOE PITTS and the Marital Community thereof; CARRIE A GORDON individually and in her Official capacity as a TROOPER of the WASHINGTON STATE PATROL and JOHN DOE GORDON and the Marital community thereof; CITY OF ABERDEEN, COUNTY OF GRAYS HARBOR, DOES 1-250,

Defendants.

NO. C 09 5119 RJB

STIPULATION AND
PROTECTIVE ORDER FOR TAX
RETURNS



STIPULATION AND PROTECTIVE ORDER
FOR TAX RETURNS -1-
C 09 5119 RJB

DORSEY & WHITNEY LLP
COLUMBIA CENTER
701 FIFTH AVENUE, SUITE 6100
SEATTLE, WASHINGTON 98104
(206) 903-8800

STIPULATION

The parties, through their respective counsel, hereby stipulate and agree that defendants have requested production of copies of plaintiffs income tax returns; that the responsive records have been serially numbered CHINN--000064 to CHINN--000071 by plaintiff, and upon preparation and filing will also include the tax return for 2009 (hereinafter "Confidential Materials"); that these Confidential Materials should be produced by plaintiff in discovery in this matter, but with redaction of plaintiffs social security number and with the following protections and limitations on dissemination and use:

1. Access to Confidential Materials shall be restricted to all named parties to this action, the attorneys of record for said parties, any paralegal, clerical or secretarial personnel employed by the attorneys of record in this action, and any experts retained to work for any party in this action. Experts must be given a copy of this Stipulation and Protective Order for Tax Returns, and agree to be bound by its terms, prior to receiving any Confidential Materials.

2. Confidential Materials may be used in connection with, and for purposes of, the above-entitled action only, and not for any other purpose including, but not limited to, use in any other litigation or dissemination to any governmental entity and/or the general public.

3. Upon termination of this lawsuit by finality of judgment or dismissal, the copies of Confidential Materials provided by plaintiff to the defendants and all additional copies defendants have made shall be returned to counsel for plaintiff or destroyed.

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1 4. Modification of this Stipulation and Protective Order may be made by further
2 order of the Court upon stipulation of the parties, or upon motion of any party for good cause
3 shown, or upon motion of the Court.

March 2, 2010

/s/ Mark S. Carlson

Mark. S. Carlson, WSBA No. 17493
Nathan T. Alexander, WSBA No. 37040
Attorney for Plaintiff

March 2, 2010
Date

/s/ Guy Bogdanovich

Guy Bogdanovich, WSBA No. 14777
Attorney for Defendant City of Aberdeen

March 2, 2010

/s/ Michael F. Tardif

Michael E. Tardif, WSBA No. 5833
Attorney for Defendant Grays Harbor County

March 2, 2010

/s/ Kenneth Orcutt

Kenneth Orcutt
Kenneth Orcutt, WSBA No. 10858
Attorney for WSP Defendants

PROTECTIVE ORDER

THIS MATTER having come before the Court on the parties' stipulation for a protective order covering certain materials to be produced in discovery, it is hereby

ORDERED, ADJUDGED and DECREED that the parties' stipulation set forth above, is adopted by the Court as its protective order.

DATED this 3 day of March, 2010.

Robert J. Bryan
United States District Judge

1 **Presented by:**

2 DORSEY & WHITNEY LLP

4 /s/ Mark S. Carlson
5 Mark S. Carlson, WSBA No. 17493
6 Attorney for Plaintiff

7 **Approved for entry:**

9 LAW, LYMAN, DANIEL,
10 KAMERRER BOGDANOVICH, P.S.

12 /s/ Guy Bogdanovich
13 Guy Bogdanovich, WSBA No. 14777
14 Attorney for Defendant City of Aberdeen

15 FREIMUND JACKSON TARDIF &
16 BENEDICT GARRATT, PLLC

18 /s/ Michael E. Tardif
19 Michael E. Tardif, WSBA No. 5833
20 Attorney for Defendant Grays Harbor County

21 OFFICE OF THE ATTORNEY GENERAL FOR
22 THE STATE OF WASHINGTON

24 /s/ Kenneth Orcutt
25 Kenneth Orcutt, WSBA No. 10858
26 Attorney for WSP Defendants

STIPULATION AND PROTECTIVE ORDER
FOR TAX RETURNS -4-
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